

From: [Marroso, David](#)
To: [Robert C. Maysey](#)
Subject: UFC | Subpoena to Top Rank
Date: Tuesday, April 04, 2017 9:48:06 AM

Rob,

We write to further our discussion regarding the subpoenas your firm served on Top Rank and Bob Arum. Without reiterating all of our positions and objections, here is what Top Rank is prepared to do:

1. Top Rank will provide the gross revenue generated from one event in each of 2013, 2014, 2015, and 2016. Our goal will be to use “representative” events.
2. Top Rank will produce the bout agreement for each fighter from the event that was filed with each State’s boxing/athletic commission. The agreements will not be redacted.
3. Plaintiffs agree to limit their examination of Mr. Arum to 3 hours, subject to defendants’ agreement to limit their examination to three hours. Examination to be in Los Angeles on a date convenient for everyone.
4. Plaintiffs and defendant agree that this production and deposition dispense with Top Rank’s obligations in the case.

Please let me know if this is acceptable to plaintiffs.

David

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